

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

C.M., on her own behalf and on behalf of her
minor child, B.M.; L.G., on her own behalf and
on behalf of her minor child, B.G.; M.R., on her
own behalf and on behalf of her minor child,
J.R.; O.A., on her own behalf and on behalf of
her minor child, L.A.; and V.C., on her own
behalf and on behalf of her minor child, G.A.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-19-05217-PHX-SRB

**CONSENT MOTION TO
HOLD RULE 30(b)(6)
DEPOSITION OUT OF
TIME (FIRST REQUEST)**

A.P.F. on his own behalf and on behalf of his
minor child, O.B.; J.V.S. on his own behalf and
on behalf of his minor child, H.Y.; J.D.G. on his
own behalf and on behalf of his minor child,
M.G.; H.P.M. on his own behalf and on behalf of
his minor child, A.D.; M.C.L. on his own behalf
and on behalf of his minor child, A.J.; and R.Z.G.
on his own behalf and on behalf of his minor
child, B.P.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-20-00065-PHX-SRB

Pursuant to LRCiv 7.3, the United States moves the Court for an order permitting the parties to hold the Rule 30(b)(6) deposition of the Department of Homeland Security (DHS) out of time. Currently, the Court's discovery order requires that the Rule

30(b)(6) deposition be taken by September 16, 2022. *See C.M.* ECF 271 at 2; *A.P.F.* ECF 274 at 2. Due to an extension of official travel, the individual DHS has designated to serve as the Rule 30(b)(6) witness is unavailable until the week of September 19, 2022. The parties have conferred. Plaintiffs consent to this request and have agreed to take the DHS Rule 30(b)(6) motion on September 20, 2022. Therefore, leave of Court is requested for the DHS Rule 30(b)(6) deposition to occur after the September 16, 2022 fact discovery deadline. A proposed Order is submitted herewith.

Submitted this August 29, 2022.

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JAMES G. TOUHEY, JR.
Director, Torts Branch

s/ Irina M. Majumdar
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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants.

s/ Irina M. Majumdar

IRINA M. MAJUMDAR
Attorney for United States of America

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